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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
<b>In re</b>	:	<b>Chapter 11 Case No.</b>
	:	
<b>LEHMAN BROTHERS HOLDINGS INC.,</b>	:	<b>08-13555 (JMP)</b>
<i>et al.</i>	:	
<b>Debtors.</b>	:	<b>(Jointly Administered)</b>
	:	
<hr/>		<b>X</b>
<b>BARCLAYS CAPITAL INC.,</b>	:	
<b>Movant for Rule 60(b) Relief,</b>	:	<b>DECLARATION OF ROY TAUB IN</b>
<b>v.</b>	:	<b>FURTHER SUPPORT OF AMEX'S</b>
	:	<b>MOTION TO COMPEL THE</b>
<b>AMERICAN EXPRESS TRAVEL</b>	:	<b>DISCLOSURE OF ALLEGEDLY</b>
<b>RELATED</b>	:	<b>PRIVILEGED COMMUNICATIONS AND</b>
<b>SERVICES COMPANY,</b>	:	<b>DOCUMENTS</b>
<b>Respondent.</b>	:	
	:	
<hr/>		<b>X</b>
<b>AMERICAN EXPRESS TRAVEL</b>	:	
<b>RELATED</b>	:	
<b>SERVICES COMPANY,</b>	:	
<b>Movant for Rule 37 Relief,</b>	:	
<b>v.</b>	:	
	:	
<b>BARCLAYS CAPITAL INC.,</b>	:	
<b>Respondent.</b>	:	
	:	
<hr/>		<b>X</b>

**DECLARATION OF ROY TAUB**

I, Roy Taub, hereby declare as follows:

1. I am an associate at the law firm Dewey & LeBoeuf LLP, attorneys for American Express Travel Related Services Company ("AmEx"). I am a member of the bar of the United States District Court for the Southern District of New York. I submit this declaration in further support of AmEx's Motion to Compel Disclosure of Allegedly Privileged Communications and Documents.

2. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the transcript of the Hearing before the court on December 16, 2008 regarding, among other things, the Motion of Barclays Capital Inc. for Relief Concerning an American Express Contract Erroneously Posted with the Closing Date Contracts.

3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Jason White, dated November 7, 2008.

4. Attached hereto as Exhibit C are true and correct copies of excerpts of the transcript of the deposition of Jason White, taken on February 5, 2009.

5. Attached hereto as Exhibit D are true and correct copies of excerpts of the transcript of the deposition of Simone Bunger-Pentney, taken on February 10, 2009.

6. Attached hereto as Exhibit E is a true and correct copy of a document produced by Barclays bearing bates number Barclays-AMEX004671.

7. Attached hereto as Exhibit F is a true and correct copy of the Declaration of Eugene J. Chikowski, dated October 27, 2008.

8. Attached hereto as Exhibit G are true and correct copies of excerpts of the transcript of the deposition of Eugene Chikowski, taken on February 11, 2009.

9. Attached hereto as Exhibit H is a true and correct copy of a document produced by Barclays bearing bates number Barclays-AMEX001101.

10. Attached hereto as Exhibit I is a true and correct copy of the Declaration of Lindsee P. Granfield, dated October 14, 2008.

11. Attached hereto as Exhibit J is a true and correct copy of Barclays's letter to the Court, dated February 11, 2009.

12. Attached hereto as Exhibit K are true and correct copies of excerpts of the transcript of the deposition of Leslie Bernauer, taken on February 6, 2009.

13. Attached hereto as Exhibit L is a true and correct copy of the Declaration of Patrick Coster, dated October 14, 2008.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 24, 2009

  
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ROY TAUB